

JP:AEL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

AARON CARMICHAEL,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER HERZOG, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about May 17, 2012, within the Eastern District of New York and elsewhere, defendant AARON CARMICHAEL did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

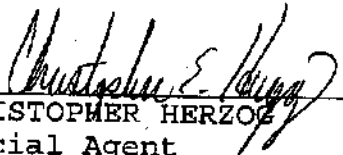
1. On or about May 17, 2012, AARON CARMICHAEL arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Caribbean Airlines Flight No. 524 from Trinidad.

2. Defendant AARON CARMICHAEL was selected for a Customs and Border Protection ("CBP") examination. After answering the standard CBP examination questions, the defendant presented a brown Ling Shi suitcase to CBP Inspectors. The defendant produced a receipt which matched the attached baggage tag, and stated in sum and substance that he owned the suitcase. During the following routine inspection of this luggage, the inspector noticed a strong odor emanating from the suitcase and that the clothing and other materials contained therein were unusually stiff. Swatches taken from items contained in the suitcase field-tested positive for the presence of cocaine. Defendant AARON CARMICHAEL was then placed under arrest.

3. The total approximate gross weight of the cocaine found in defendant AARON CARMICHAEL's suitcase is 14,988.7 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant AARON CARMICHAEL be dealt with according to law.


CHRISTOPHER HERZOG
Special Agent
HSI

Sworn to before me this
18th day of May, 2012

THE HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK